

Michael J. Coffino (Admitted *Pro Hac Vice*)  
Jaime J. Santos (JS-3361)  
THE CRONE LAW GROUP  
101 Montgomery Street, Suite 2650  
San Francisco, CA 94104  
Telephone (415) 955-8900  
Fax (415) 955-8910

Lawrence Brocchini (LB-2628)  
REAVIS PARENT LEHRER LLP  
41 Madison Avenue, 41st Floor  
New York, NY 10010

Attorneys for Nominal Defendant  
CHINA NORTH EAST PETROLEUM  
HOLDINGS LIMITED

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JUDITH STRICKLAND, Derivatively On  
Behalf of Nominal Defendant CHINA  
NORTH EAST PETROLEUM HOLDINGS  
LIMITED,

Plaintiff,

v.

WANG HONGJUN, YU LIGUO, ROBERT C.  
BRUCE, EDWARD M. RULE, LI JINGFU,  
ZHANG YANG DIO, JU GUIZHI,

Defendants,

- and -

CHINA NORTH EAST PETROLEUM  
HOLDINGS LIMITED,

Nominal Defendant.

C.A. No. 1:10-cv-05445 (MGC)  
ECF Case

[Captions continued on following page]

SHERWIN DROBNER,

Plaintiff,

v.

WANG HONGJUN, ROBERT C. BRUCE,  
EDWARD M. RULE, LI JINGFU, YU LIGUO,  
JU GUIZHI, ZHANG YANG DIO,

Defendants,

- and -

CHINA NORTH EAST PETROLEUM  
HOLDINGS LIMITED,

Nominal Defendant.

C.A. No. 1:10-cv-06319 (RMB)

JONO NICOLN, derivatively on behalf of  
CHINA NORTH EAST PETROLEUM  
HOLDINGS LIMITED,

Plaintiff,

v.

WANG HONGJUN, ZHANG YANG DIO, JU  
GUIZHI, YU LIGUO, ROBERT BRUCE,  
EDWARD RULE, RUI SHI HU, and LI  
JINGFU,

Defendants,

- and -

CHINA NORTH EAST PETROLEUM  
HOLDINGS LIMITED,

Nominal Defendant.

C.A. No. 1:10-cv-06344 (RMB)

**NOMINAL DEFENDANTS' CORRECTED NOTICE OF MOTION TO DISMISS**

PLEASE TAKE NOTICE that, this Corrected Notice of Motion to Dismiss is being filed solely to correct the Response Date entry used on the Court's ECF system. The correct Response Date is May 9, 2010 pursuant to a stipulation among the parties.

PLEASE TAKE FURTHER NOTICE that, upon the accompanying declaration of Michael J. Coffino dated April 20, 2011 and the exhibits attached to the declaration, this notice, the accompanying memorandum of law in support of this motion, any subsequent submissions that shall be made in support of this motion, and all prior proceedings, the undersigned, on behalf of Nominal Defendant, China North East Petroleum Holdings Limited, will move this Court, before the Honorable Miriam G. Cedarbaum, at the United States Courthouse, 500 Pearl Street, New York, New York, at 10:00 a.m. on May 19, 2011, to dismiss the Verified Amended Shareholder Derivative Complaint, in its entirety and with prejudice, pursuant to Federal Rules of Civil Procedure 12(b)(6) and 23.1.

Dated: April 21, 2011

Respectfully submitted,

THE CRONE LAW GROUP

By: /s/ Michael J. Coffino

Michael J. Coffino  
Admitted *Pro Hac Vice*  
(California Bar No. 88109)  
mcoffino@cronelaw.com

Jaime J. Santos (JS-3361)  
Admitted in New York and S.D.N.Y.  
jsantos@cronelaw.com

101 Montgomery Street, Suite 2650  
San Francisco, California 94104  
Telephone: (415) 955-8900

*Attorneys for Nominal Defendant*

China North East Petroleum  
Holdings Limited

*Of Counsel:*

Lawrence Brocchini (LB-2628)  
[lbrocchini@rpl-law.com](mailto:lbrocchini@rpl-law.com)  
REAVIS PARENT LEHRER LLP  
41 Madison Avenue, 41<sup>st</sup> Floor  
New York, New York 10010  
Telephone: (212) 763-4140